

Larry Greene
Air Pollution Control Officer
Yolo-Solano Air Quality Management District
1947 Galileo Ct., Suite 103
Davis, CA 95616

Re: Draft Title V Permit - Woodland Biomass Power Ltd.

Dear Mr. Greene:

EPA appreciates the opportunity to review the District's proposed Title V permit for Woodland Biomass Power Ltd. We have noticed three major issues which need to be addressed. These issues are listed below. In addition, we are enclosing several suggestions for your consideration and permit improvement.

1. a. Condition 77 lists exhaust stack emission limits for the fluidized bed combustion system and the source test method for TSP. Additional source test methods for SO₂/SO₄, NO_x, CO and VOC were identified in the application. We believe these source test should be identified in this condition as well as the source test method for TSP. These additional source test methods are provided in the columns below.

<u>Pollutant</u>	<u>Source Test Method</u>
SO ₂ /SO ₄	40 CFR 60 Appendix A, Method 5/8
NO _x	CARB Method 100
CO	CARB Method 100
VOC	40 CFR 60 Appendix A, Method 18
NH ₃	BAAQMD Method ST - 1B

b. Because these source tests require different averaging times, strike the line in condition 77, "as determined by the average value of three one hour source tests," and indicate the actual averaging time for each source test.

2. 40 CFR part 60.13 requires the owner or operator of an affected facility to conduct continuous opacity monitoring and continuous emission monitoring system performance evaluations in accordance with the applicable performance specification in 40 CFR part 60, Appendix B. These specifications were identified in the application. However, they were omitted from the proposed permit.

Three new conditions need to be added to the permit requiring performance evaluations be conducted for the continuous opacity monitoring system and continuous emission monitoring systems for SO₂ and NO_x. Each condition should cite 40 CFR part 60.13 and Appendix B and indicate which specification is applicable for these pollutants as provided in the columns below.

<u>Pollutant</u>	<u>Performance Specification</u>
Opacity	Appendix B, Spec. 1
SO ₂	Appendix B, Spec. 2
NO _x	Appendix B, Spec. 2

3. Based on the information provided in the application (Form 3.8-A1 in Section 1 and Table in Section 9), the facility may store or handle greater than the threshold quantity of ammonia. When the owner or operator knows the source is subject to Section 112(r), (accidental release prevention requirements), it must submit a risk management plan by the date specified in 40 CFR 68.10. Further, the source shall certify compliance with the requirements of 68 as part of the annual compliance certification as required by 40 CFR part 70 and 71.

For cases in which the source may become subject to 40 CFR 68 in the near future, the permit may include a requirement for future submittal and compliance with the dates provided in 40 CFR 68 to preclude a permit re-opening.

The District may issue the permit if the above issues are addressed. We also encourage the District to include our other recommendations as well. Please note that if the permit is later found to require corrective steps (including, but not limited to, reopening the permit for cause) the expiration of both EPA's review period and the public petition period does not compromise the Agency's authority to take such measures. The terms contained in this permit are specific to the facility and do not create conditions for the use, operation, or reliance of any other party.

We appreciate your attention to our comments. If you have any questions, please call Kathy Diehl of my staff at (415) 744-1232.

Sincerely,

Matt Haber
Chief, Permits Office

cc: D. Randall Bates, Woodland Biomass Power Ltd.
Ray Menebroker, ARB

Enclosure
Woodland Biomass Power, Ltd.
Proposed Title V Operating Permit

1. Including the term “Non-Federally Enforceable” in the table title on page 13, will clearly show that the requirements on this page are not federally enforceable. Therefore, there will be no need to repeat non-federally enforceability of reportable quantity for each individual HAP.
2. Changing the title on page 14 to “Federally Enforceable Conditions” from “Title V Operating Permit Conditions” may better distinguish federal and non-federal enforceability conditions.
3. Avoid using vague terms such as “reasonable” (e.g., page 15). Use a more specific term such as “mutually agreed upon time”.
4. Correct the typographic error for SIP approval date under condition #21 (change 98 to 78).
5. For condition # 30 for EPA submittal, add: Attention Air-3.
6. Condition #77 indicates that the source tests shall be based upon a rated heat input of 450 MMBTU/HR. However, the 1994 permit included in the application indicates a rated heat capacity of 330 MMBTU/HR. Please clarify the value of the maximum rated heat capacity.